

ORIGINAL
FILE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

RECEIVED

JAN - 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the Cable)
Television Consumer Protection)
and Competition Act of 1992)
)
Broadcast Signal Carriage Issues)

MM Docket No. 92-259

To: The Commission

COMMENTS OF
UNITED VIDEO, INC.

United Video, Inc.
3801 S. Sheridan Road
Tulsa, OK 74145
918/665-6690

January 4, 1993

No of Copies rec'd
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

RECEIVED

JAN - 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the Cable)
Television Consumer Protection) MM Docket No. 92-259
and Competition Act of 1992)
)
Broadcast Signal Carriage Issues)

**COMMENTS OF
UNITED VIDEO, INC.**

INTRODUCTION

In response to the Commission's Notice of Proposed Rule Making, United Video, Inc. is submitting these comments to address several specific issues which will affect not only the cable industry, but will significantly impact television viewers throughout the United States.

United Video, Inc. is a satellite carrier based in Tulsa, Oklahoma serving more than 18,000 cable television systems and 35 million cable television subscribers throughout the United States. The company transmits the signals of superstation WGN from Chicago, as well as WPIX, New York; KTVT, Dallas-Ft. Worth; and KTLA, Los Angeles. An affiliated company provides signals to the home satellite dish (HSD) market. United Video Satellite

Group, the parent company of United Video, Inc., provides various other communications and programming services through affiliated companies.

It is clear that Congress' intention in passing the "Cable Television Consumer and Competition Act of 1992" was to provide consumers with a multitude of programming choices at reasonable prices. In implementing the various regulations under the Act, United Video is concerned about the unintended adverse effects such regulations could have on consumers. These effects include:

- o The loss of frequently viewed regional superstations
- o The loss of popular national satellite delivered superstations
- o Unnecessary cost increases for cable operators, which increases in basic cable rates
- o Constant channel realignments and disruptions

We urge the Commission to proceed in a manner that will assure marketplace stability and minimize the adverse effects of this legislation on consumers.

ESTABLISH INDUSTRY WIDE TIMETABLE FOR MARKET ADJUSTMENTS

A number of regulations which the Commission must adopt pursuant to the 1992 Act will require cable television systems to adjust their line-up of broadcast signals based on market adjustments. Examples of such adjustments include:

- o The election by broadcast stations of either retransmission consent or must carry status
- o Arbitron ADI market redefinition
- o Commission adjustment of top 100 television markets

Under the 1992 Act, broadcasters are required to elect retransmission consent or must carry every three years. Therefore, we recommend that the Commission establish an industry-wide timetable of three years for ADI and top 100 market adjustments which coincides with the retransmission consent/must carry election schedule. A three-year timetable will allow cable operators to avoid constant channel realignment as a result of frequent, insignificant market adjustments, yet will provide a continuous and predictable schedule for change. Likewise, such a timetable will minimize unnecessary disruptions to consumers.

As consumer disruption is of major concern, this timetable should be established with at least a six-month lead time. Channel realignments require ample time for operators to notify consumers, franchise authorities, listing services, and cable programmers and must be coordinated with the cable system's mailing and billing cycles. Finally, the Commission should establish this timetable to concur with the Copyright Statement of Account accounting periods beginning January 1 and July 1. Copyright payments are made for all distant broadcast stations carried during any portion of an accounting period. Conflicting timetables would result in unnecessarily inflated copyright payments for cable operators and subsequent rate increases to cable consumers.

TOP 100 MARKET UPDATE -- RETENTION OF DISTANT SIGNAL QUOTAS

In its Notice of Proposed Rule Making, the Commission requested comments on how the Top 100 Television Market List should be modified to ensure that it reflects current market realities. A most critical factor in the Commission's evaluation of this issue relates to copyright liability and its impact on subscribers' viewing choices and ultimately on subscriber rates.

Copyright fees for the top 100 markets are currently calculated according to the market listing in Section 76.51 of

the Commission's rules, which was based largely on Arbitron's 1970 market rankings. As noted by the Commission in its Rule Making Notice, the television marketplace has changed substantially since 1970. Consequently, the Commission should adopt procedures which not only update the television market list to reflect current market realities, but in addition, establish a framework which allows continuous market updates in conjunction with other market driven adjustments. By adopting the three-year timetable in conjunction with retransmission consent and must carry elections, the Commission will ensure that the new regulations are in line with the "real world", yet avoid unnecessary marketplace disruptions.

In updating the list, it is essential that the Commission -- along with the Copyright Office -- establish a policy of grandfathering signal quotas for the top 100 markets as set out in Section 76.51 of the rules. Failure to grandfather existing quotas will force cable operators to drop popular regional and national distant stations to avoid payment of the substantial copyright penalty rate. Consumers will lose access to distant broadcast stations which are among the most popular stations on cable, and which provide consumers with the following:

- o Frequently viewed programs not available on local broadcast stations;
- o Programming which provides an essential link to neighboring metropolitan areas for consumers who reside outside legislative defined "local" or "home" market areas;
- o A diversity of professional, collegiate and high school sporting events either not carried or not available on local broadcast stations;
- o Valuable programming which includes series, movies, news, sports, educational programs, cartoons, local and national talk shows, specials, and community affairs programs; and
- o A variety of program choices available at alternate viewing times compared to those available locally.

A comparison of Arbitron's current market list with the Section 76.51 market list indicates that there are currently thirteen Arbitron defined markets which are no longer ranked in the top 100. If existing quotas are not grandfathered, the effects in these thirteen markets would be as follows:

- o For over 100 cable systems serving more than 3.24 million cable consumers, the copyright distant broadcast station quota will drop from 2 to 0.
- o To avoid paying copyright penalty fees of 7.5% of annual gross revenues (3.75% per distant station) cable operators will be forced to drop these distant signals.
- o As a result, consumers will lose access to almost 4,000 hours per week of programs provided by these distant broadcast stations.

For example, over 90,000 cable homes throughout Minnesota, North and South Dakota would lose access to KMSP, a Minneapolis independent which provides coverage of the Minnesota Northstars NHL Hockey, the University of Minnesota Hockey team, state high school basketball and hockey, Minneapolis news and community affairs programs, and a variety of movies, series, children's and educational programs. In addition, these 90,000 cable homes would lose access to superstations WGN and WTBS, two of the top 100 most highly viewed cable networks in the industry.

Consumers will react swiftly and strongly to the loss of these stations. United Video consistently monitors subscriber reaction to the loss of superstations like WGN. When consumers lose stations that have become part of their daily entertainment fare, the community reaction and backlash can be substantial. Attachments A, B, C and D provide several examples of the consumer outcry as a result of lost superstation programming.

By grandfathering existing top 100 market quotas, the Commission will ensure consumers continued access to their favorite programs. This approach is consistent with the Copyright Act, which specifically provides that there shall be no adjustment in royalty rates for any distant signal "permitted" under the Commission's rules in effect on April 15, 1976. This provision grandfathered all signal carriage under the rules then in effect, including the top 100 market list in Section 76.51, and was specifically included to avoid disruption of viewing habits and the loss of programming to consumers.

Furthermore, since the new top 100 market listing is required to "reflect current realities", cable systems that are located in markets which have become top 100 markets under the new rules should be permitted to carry the full quota of distant signals which would have been applicable if those markets had been included in the 1976 list.

ALLOCATION OF INCREMENTAL COPYRIGHT FEES

It is clear under the 1992 Act that a broadcaster seeking to take advantage of the new must carry requirements is required to pay any additional copyright fees incurred by the cable system. Copyright fees are calculated on a sliding scale, where each distant broadcast station carried results in an incremental fee and/or penalty fee of 3.75% of the cable system's gross revenues. The regulations adopted by the Commission on this particular issue should clearly state that the broadcaster, not the cable operator, is to pay all copyright fees associated with the incremental new "must carry" distant station. Therefore, even if the new must carry distant station results in a penalty copyright fee, the broadcaster is to pay the penalty copyright fee amount. To confirm this provision, the Commission should rule that the date the station is added to the cable system shall determine the copyright royalty rate for that station. Payment of any of these incremental fees by the cable operator would be inconsistent with the 1992 Cable Act and would undoubtedly result in loss of programming or in higher monthly rates to cable consumers.

MICROWAVE CARRIERS AND RETRANSMISSION CONSENT

Section 325 of the 1992 Act provides that no cable system may retransmit a broadcast station unless the originating station has granted retransmission consent to the cable system or the originating station asserts its must carry rights as a local market station. However, the statute specifically provides that the retransmission consent requirements do not apply to superstations if the "superstation was obtained from a satellite carrier and the originating station was a superstation on May 1, 1991". The exempt superstations would include WGN, WTBS, WWOR, KTVT, and KTLA. Both the plain language of the statute and the legislative history confirm that this exception is intended to exempt from retransmission consent only those superstations which were being retransmitted by satellite carriers on May 1, 1991 and which are currently received from a satellite carrier. Such stations delivered to cable systems by terrestrial microwave are clearly not exempt from retransmission consent. Thus cable systems which intend to continue carriage via terrestrial microwave facilities must obtain the retransmission consent of the originating station.

The Commission should authorize satellite carriers and terrestrial microwave carriers to act as agents on behalf of

cable operators in obtaining retransmission consent from broadcast stations. Permitting these carriers to operate as a central clearing house for all of their customers will facilitate this process to the benefit of both the broadcasters and cable operators involved.

RADIO STATIONS EXEMPT FROM RETRANSMISSION CONSENT

Radio stations, enjoyed by millions of cable consumers, should not be subject to the retransmission consent provisions of the "Cable Television Consumer and Competition Act of 1992". It is clear that Congress had no intention of including audio signals with television signals with regard to retransmission consent. Nowhere in the text of the statute are audio signals mentioned, nor is there any discussion with respect to applying such regulations to the audio market.

CHANGES IN TELEVISION MARKETS TO REFLECT MARKET REALITIES

Allowing broadcast stations to modify already clearly defined television markets -- especially once updated by the Commission -- is of concern to United Video, Inc. Our data indicate that over 700 commercial broadcast stations are currently carried by a cable system outside their home ADI. If each of these commercial stations (representing one-half of all

commercial stations) request market definition changes, the impact on consumers, not to mention the Commission, would be overwhelming. Many cable consumers will already lose access to programming as operators are required to comply with must carry requirements for signals within their home ADI. Attachment E illustrates the loss of programming to consumers in 12 cable systems as a result of must carry requirements. Lenient FCC guidelines for TV market changes will result in even greater programming losses for consumers. Consequently, United Video, Inc. recommends the following general guidelines with regard to television market changes:

1. Guidelines for the inclusion of additional communities in ADI's should be stringent. In addition to carriage, viewership, and mileage guidelines, nonduplicated, value-added programming and coverage should be quantifiably justified by the station.

2. Likewise, the definition of duplication should be expanded to include the system's entire channel line-up. In other words, if 50% or more of the programming carried by the station is available within the system's current channel line-up, the station's special relief status should be denied.

3. Both cable operators and broadcast stations should be allowed to file a petition for special relief, with the burden of proof on the requesting party.

4. Finally, the granting of special relief should follow the three-year timetable along with other market related adjustments. Consumers must be protected from major disruptions caused by minor regulatory anomalies.

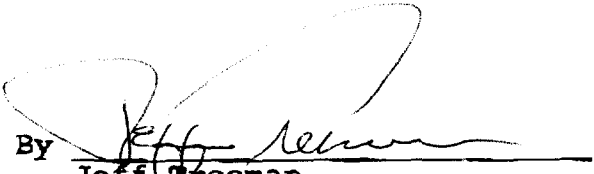
CONCLUSION

In today's environment of evolutionary technological advances, consumers expect regulations which will enhance -- not hinder -- their home entertainment options. In keeping with the underlying policy of the 1992 Act of assuring consumers reasonable subscriber rates for a vast array of programming, the Commission should make every effort to limit unnecessary cost increases for cable operators. In addition, the Commission should make every effort, as has been its long-standing policy, to minimize consumer disruptions.

Respectfully submitted,

UNITED VIDEO, INC.

By



Jeff Freeman
President

January 4, 1993

HELENA INDEPENDENT RECORD

HELENA, MT
DAILY & SUNDAY 13.010

TUESDAY
OCT 23 1990

BURRELLES

They want WGN back

By LYNN SOLOMON
IR Staff Writer

Ho!y'cow — Helenans miss WGN.

Local fans of the Chicago Cubs (and Bulls, White Sox, Black Hawks, DePaul Blue Demons and Bozo the Clown children's programming) have been suffering since October, 1988, when Chicago superstation WGN went off the Helena cable line-up.

But now those fans are mad as heck — and they're not going to take it anymore.

A handful of local WGN fans have organized to return the Chicago station to local cable boxes, and they're kicking off their crusade at a meeting Wednesday night at 5:30 p.m. at the public library.

They have placed petitions at 30 businesses in town and they hope to gather enough signatures to convince TCI Cable to bring back WGN.

The campaign is the brainchild of Paul Spengler, Bob Musselman and John Perros. Spengler and Perros grew up in the Chicago area and Musselman, although he wasn't raised in Chicago, also is a die-hard Cubs fan.

Every time one of the trio would mention WGN and how much they missed it, they found others who agreed.

"There's a lot of support for (the drive)," Spengler said. "It's a grassroots citizens' movement, our version of fighting City Hall."

But instead of City Hall, the group is trying to get the attention of TCI chairman John Malone.

An article on Malone in the June, 1989 issue of *Channels* magazine, said that TCI has a rule that if 5 percent of its viewers request, in writing, the return of a service or program that TCI has bumped, the cable company will reinstate it.

Estimates are that there are 11,000 cable subscribers in the Helena area, so Musselman said the group is shooting for 550 signatures.

The petitions will be circulating for a few weeks and the group hopes to make its appeal before the end of the year.

"Helena is the kind of place where three or four people can get together and make things happen," Musselman said. "That's why I like living here."

Viewers win! Heritage to keep WGN

By BILL HETHCOCK
Star News Staff

FRONT PAGE

Besieged by a record number of phone calls and letters protesting a proposed programming change, Heritage Cablevision officials have decided to keep Chicago Superstation WGN on its 28-channel lineup.

Area Manager Neil Haman announced the decision Friday.

"We had enough reaction to reconsider and agreed the channel needs to stay," Haman said. "We're delighted our subscribers let us know how they feel. That's what it's all about."

In late May, Heritage Cablevision announced a plan to replace WGN-Chicago with American Movie Classics. The move would have saved the cable company \$600,000 per year in broadcast rights, Haman said.

He said the cost Heritage pays for WGN will go up "substantially" on July 1 due to a change in copyright law, which sends more money back to original artists in television programs.

However, the change will not bring WGN or the station's distributors increased revenues.

The rates WGN distributors charge cable carriers have not increased since 1978, according to WGN affiliate representative Sharon Metz. Heritage has carried the signal since 1982.

Metz said she is pleased Heritage decided to continue offering WGN in the area.

"That's wonderful news," she said Friday. "We're very pleased Heritage came to an agreement locally and responded to their subscribers requests in the Rio Grande Valley."

Besides being a cost-saving move, Heritage also defended the proposed channel switch as a way to diversify its programming lineup.

However, many Valley cable customers viewed the change as a way to offer viewers a lower quality alternative for the same price.

More than 1,000 viewers contacted the cable company to register their dissatisfaction, with many threatening to cancel their cable subscriptions. That amounts to over one percent of all Heritage customers, Haman said.

Besides the avalanche of letters and phone calls, petitions protesting the change circulated

VALLEY MORNING STAR

HARLINGEN, TX
DAILY 26,662

SATURDAY
JUN 15 1991

265 **BURRELLE'S** HX

WGN

Continued From A1

through several Valley cities and the Rancho Viejo Board of Aldermen passed a resolution opposing the channel switch.

Numerous letters opposing the programming change appeared in Valley newspapers.

Winter Texans and sports fans were especially displeased with the proposed move, since many rely on the station to supply news and sports from back home.

Haman said he expected heavy protesting when the announcement to remove WGN was made. However, he said, the opposition was even heavier than he imagined.

"It was going to provide such a savings we felt like we had to give it a shot, but response was so heavy we changed our minds," he said.

Heritage spends more than 30 percent of its operating budget on programming costs, he added.

He said viewers who were looking forward to AMC can expect to receive the channel within the next two years as part of a Heritage system upgrade which is also expected to bring the Fox network into the system.

Besides sports and news, some of the popular programs on WGN include *Bozo the Clown*, *Bewitched*, *The Honeymooners* and *Leave It To Beaver*.

The latest Nielson ratings show 64.1 percent viewership of WGN in the Valley, meaning two out of three households tuned in to the station weekly.

COPYRIGHT
JUL 11 1988

BURELLES

The fans are angry that cable stations dropped Cubs games

By Katherine Phillips
News Leader staff writer

As Chicago Cubs fans in Northern Virginia filed a lawsuit against Media General Cable of Fairfax County for taking away the cable station that carried their favorite team's games, Cubs fans in Chesterfield County staged a protest march to show Stoner Cable how they felt.

The protesters — three adults and eight children — spent about half an hour last Thursday in the parking lot of Stoner Cable's Ironbridge Road headquarters. But they did not approach general manager Michael T. MacNeilly to ask why he replaced Chicago superstation WGN with Home Team Sports at the beginning of this month.

Non-marching protesters showed a bit more strength. By week's end, more than 200 subscribers (in the system's 43,000 households, 110,000 people) had called to protest the change, MacNeilly said.

Raise rates or drop signal

"Anytime you take anything off you upset people," MacNeilly said. "The facts are this: We have listened for a year to people who want Home Team Sports (which carries American League baseball and Colonial Conference sports). That, plus the increased copyright fees (now demanded by superstations like WGN) ... left me with the choice of either raising rates or taking off one of our distant sig-

nals." (New York/New Jersey-based WWOR and Atlanta-based WTBS are other superstations carried).

"It was based on a business decision," MacNeilly said.

Affinity for Atlanta

The decision to drop WGN rather than WWOR or WTBS was made because "There's a definite affinity here for Atlanta — because of the Braves — and the New York/New Jersey area, because of all the transplants living in the county."

"I decided this was simply the least of three evils ... and no, we're not planning to bring back any of the general manager said.

Although more than 1,000 Northern Virginia Cubs fans (there are 184,000 customers in the Fairfax County system) signed petitions delivered to their cable company's office, the lawsuit does not ask that WGN be returned — but simply that subscribers be more fully informed when cable executives are making programming decisions.

COPYRIGHT
GAZETTE

GREAT FALLS, VA
WEEKLY

JUL 7 1988

205 BURELLES 51

Cubs Fans United

Local Cubs fans protest loss of cableTV station WGN, are on the lookout for alternatives to Media General Cable

By Denise Marois

The decision by Media General Cable of Fairfax to drop WGN-TV in Chicago and along with it, afternoon Cubs games, has motivated Cubs fans to do more than complain.

They're looking for ways to pick it up without Media General's help.

Raymond Galant, chairman of Citizens for Cubs (C-Cubs), a group of fans who have organized vocal protests and rallies to keep WGN on the air, said the group has been in touch with Commonwealth Systems Specialists in Camp Springs, Md. Commonwealth Systems provided satellite dishes for Montgomery County cable subscribers when the county dropped WGN recently.

C-Cubs has also spoken with representatives of Wireless Cable of

Rockville, Md., which services portions of Washington and may move into Northern Virginia next year, Galant said. Talks with both companies were promising, he said.

Galant has been organizing Cubs fans since he opened his cable bill on Friday, June 21, to find a station besides the Media General was dropping WGN, the Chicago superstation that carries Cubs games in the afternoon.

C-Cubs has hired Washington communications attorney Sam Simon in an attempt to halt the cable company from dropping WGN on July 1.

The campaign has been an emotional one, and Galant said he has made a lot of surprising allies. Parents with children in Little League, a woman in a nursing home and a man who has had a quadruple

bypass have all called to tell Galant how important Cubs games are to them, he said.

Even local community leaders and politicians are joining the fray. Mason District Supervisor Thomas Davis III has been heard grumbling about Media General dropping four Baltimore seasons, and Fairfax County Board of Supervisors (Chairman Audrey Moore has received 40 calls and about 15 letters from constituents angry over the decision.

Speaking as a citizen, Vienna Town Manager John Schoeberlein said he was "extremely upset" about the decision. Schoeberlein, who is originally from the Chicago area, said he's been watching Cubs games all his life.

"I signed up for cable for the sole reason (that) they carried the Cubs," he said.

Not one to sit idly by and let his beloved home team give way to dead air, Schoeberlein said he has been gathering signatures on a petition to keep WGN in the Media General roundup. In one hour he collected 35 signatures, he said.

"They (Media General) made statements (it duplicated other channels. I don't know where I can find 140 Cubs games on other channels, certainly not on a home shopping channel," he said.

Why the Cubs, who haven't won a pennant since 1945, according to Galant, should generate so much outpouring of

affection is hard to answer.

"It's something to watch," Galant said. "It's baseball. People love something to do in the afternoon. Some of these people love (Cubs announcer) Harry Caray."

Nevertheless, Media General Chairman Thomas E. Waldrop said he stands by his decision to drop the superstation and replace it with a shopping channel and Turner Network Television.

"We carry eight distant-signal channels, the most of any in the country as far as I know," Waldrop said. "To keep all of them this year would cost \$3.8 million and \$4.4 million next year. The copyright cost on the third distant signal channel for a superstation would have cost \$1.5 million next year."

Subscriber research done in March showed only about 1 percent of viewers watched WGN, and it would cost the company \$675,000 or 36 cents per subscriber to keep WGN.

"Overall, it was a tough decision. I think it was a smart business judgment," Waldrop said.

Simon said he is trying to collect 1,500 signatures to convince Waldrop there are enough fans out there to warrant keeping WGN, and he is hoping Waldrop will decide to keep the station on his own.

But there is some question, according to Simon, as to whether the survey on which Waldrop allegedly based his decision to drop WGN, was conducted after the decision had already been made.

ATTACHMENT C

COPYRIGHT
The Washington Post
WASHINGTON D.C.

WGN
SUSQUEHANNA TRANSCRIPT

ATTACHMENT D

SUSQUEHANNA, PA
2-TIMES/WEEK 2,500WEDNESDAY
SEP 9 1992

BURRELLE'S

529

To The Editor 11096

I am writing this letter in regard to the Adams Cable Co. considering taking away our channel 9 WGN Chicago. How dare they? What would I do if I couldn't see my "beloved Chicago Cubs"? My family and I are steady everyday watchers of channel 9 Chicago. They have everything in family programming.

So please, Susquehanna, call them, write them, do what it takes to keep it on the air.

Dorothy A. Holmes
Floyd A. Mead

To The Editor

We are subscribers to CATV and are concerned that they plan to take off WGN Chicago. We like that channel - especially the Cubs games.

We ask that they do not take it off - please.

Mr. & Mrs. Ted Keyes

To The Editor

We, as cable customers, are concerned that WGN-TV (Chicago) is being taken off our cable. We have been loyal fans of the Chicago station and, if at all possible, would like to see the Chicago station left on our cable.

Mrs. Raymond Marshall
Leland Glover

P.S. My wife and I go to spend time with Mr. Glover, who is 90 years old! His favorite past time is watching the CUBS!!

Larry E. French

To The Editor

We request that Adams Cable TV leave the Chicago station on our cable system. This station is one of the better stations.

Mr. & Mrs. Howard Rood

To The Editor

We understand that Adams Cable is taking the Chicago station off the air. Why? Just because they don't like it? Let's not forget that WE are the ones paying their bills. Let it alone. May they don't like it.

The Susquehanna Transcript
212-216 Exchange Street
Susquehanna, PA 16847
Phone: 717-853-3134
FAX: 717-853-4707
USPS 637-300

Charles Ficarro, Co-Publisher/Editor
Rita Ficarro, Co-Publisher/Accounting
Brian Lewis, Publishing Sales Manager
Terry Gow, Advertising Sales Mgr.
Terry Gow, Newsstand Circulation

General News Staff:
Louis Parrillo, Gary Gray
Carole Canfield Allen, Brinton Cresse
Corresponding News Staff:
Kathleen Ackley, Shirley Rife
Brian Gafney
Word Processing: Theresa Miller
Production: Benjamin Ficarro

1992 Subscription Rates: In County -
\$22.00/year; Zones 1 & 2, \$25.00/year;
Elsewhere, \$28.00/year.

Opinions expressed in Letters To The Editor and correspondence received are not necessarily those of the Transcript management.

but others do.

Helena & Floyd Maby

To The Editor

This is about the Adams CATV taking off Channel 9 in Chicago. We want to keep the Chicago station on and we think that Adams TV should listen to what the people want. We all watch the Chicago station and really enjoy it.

James Snyder
Mary Snyder
Mike Snyder

To The Editor

Thanks, For Nothing

We would like to express a big "Thank You" to the Ararat Township resident for NOT BEING A MAN and NOT KEEPING HIS PROMISE of paying our way to the Hartford Fair, as payment for all the hard work we have done on his property.

Your promise was worth "nothing"! A person is only as good as his word. We fulfilled our end of the promise, is this the way to teach children the moral values of a person's word?

What a disappointing lesson for us to learn.

Sherry, Christopher
and Joseph Siggins

To The Editor

Overwhelming Requests

This is a support letter for the retention of Chicago Channel 9 by Adams CATV.

The members of the Oakland Borough Council have received overwhelming requests from Adams customers that this council do everything possible to make Adams keep this channel (9) available to our viewers.

Very truly yours,
Oakland Borough Council
E.J. Gordon
Secretary

To The Editor

Not In Good Conscience

Lon Parrillo, in his Sept. 2 column, gave many reasons why people should not vote for George Bush. For balance, I want to give only one reason why I can not vote for Bill Clinton.

When you vote for President, you also vote for the person who will be 'Commander-in-Chief' of our armed forces in a troubled world.

I can not, in good conscience, vote for a 'Draft-Dodger' to fill this role.

A vote for Clinton would be a 'slap in the face' to every Veteran who ever served our country and demand the memory of every American who 'died to make men free'.

Sincerely,
Robert O. Norton
Oakland

To The Editor

County Farm Program

Following is a copy of the letter our agency will be forwarding to county farmers and producers. We would greatly appreciate your cooperation in announcing this latest program being offered by our Federal government at your earliest convenience.

Thank you for your help in this matter.

Sincerely,
Charles G. Perkins, CED
Susquehanna Co. ASCS Office

Dear Producer,

As of September 2, 1992, Secretary of Agriculture, Edward Madigan reported that the \$755 million in emergency funds for agricultural disasters as allocated by President Bush are applicable to

ATTACHMENT E

EFFECTS OF MUST CARRY REQUIREMENTS ON CABLE SYSTEMS							
			COMM.	COMM.	COMM.	NON-COMM.	LOSS
	CHANNEL	OPEN	STATIONS	STATIONS	STATION	STATION	OF
SYSTEM	CAPACITY	CHANNELS	REQUIRED	CARRIED	ADDS	ADDS	CHANNELS
Ft. Lauderdale, FL	41	0	14	11	3	2	5
St. Louis, MO	52	0	17	9	1	1	2
Albuquerque, NM	45	0	15	8	5	1	6
Atlanta, GA	63	1	21	9	2	1	2
Wilmington, DE	51	2	17	9	4	2	4
Vista, CA	37	0	12	11	0	0	0
Hollywood, CA	57	6	19	13	2	2	0
Baltimore, MD	46	0	15	9	4	2	6
Washington, DC	62	3	20	13	4	4	5
Lanham, MD	84	5	26	18	3	3	1
Marin County, CA	37	0	12	11	1	3	4
Alexandria, VA	51	0	17	9	2	2	4
AVERAGE	52	1	17	11	3	2	3

Source: A.C. Nielsen Code Data 11/92
Based on an analysis by United Video, Inc.

UNITED VIDEO, INC. 1/4/93